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Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

January 2, 2002

To: All In-Station Diagnostics (ISD) Developers and Vapor Recovery Equipment Manufacturers:

The Air Resources Board's (ARB) Enhanced Vapor Recovery (EVR) regulations require vapor recovery systems to be certified with an in-station diagnostic (ISD) system effective April 1, 2003 for new and modified facilities with a throughput greater than 1.8 million gallons per year. On April 1, 2004, ISD is required for new and modified facilities with a throughput greater than 160,000 gallons per year. Under the current EVR regulations as specified in CP-201, Certification Procedures for Vapor Recovery Systems at Dispensing Facilities, the ISD systems are considered to be system specific and would, therefore be subject to individual certification testing on each system.

The ARB staff is considering a proposal that would reduce the certification testing for ISD. The proposal will require that ISD complete the full EVR certification test of at least 180 days on a vapor recovery system type. Once certified with a specific vapor recovery system type, additional vapor recovery systems within the vapor recovery system type may be certified if testing shows that the ISD system is compatible. The operational test for the additional system is expected to be less than 180 days but may be as long as 180 days if there is technical justification. Vapor recovery systems that do not fit in the proposed system type categories will require a full ISD certification evaluation, specific to that vapor recovery system. The enclosed table defines the system type based on vapor recovery systems certified prior to the adoption of the EVR regulations. We recognize that EVR may lead to new definitions of system types that are not listed in the table.

A failure of certified Phase I or Phase II vapor recovery system equipment which causes the system to perform improperly, may cause the termination of the operational testing period of the vapor recovery system, but will not necessarily result in termination or failure the ISD certification test. If the ISD system does not detect a failure as required, the ISD certification test will be terminated. If ISD is part of a vapor recovery system that has not been certified, failure to comply with the applicable performance standards or specifications will terminate the certification testing.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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We would appreciate receiving your comments on the proposal by no later than January 25, 2002. If you have questions or need further information, please contact Joe Guerrero at (916) 324-9487 or via e-mail at jguerrer@arb.ca.gov.

Sincerely,

Signed Copy on File

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division

Enclosure

cc: Rosa Salcedo, San Diego County APCD

**Proposed Vapor Recovery System Types
for In-Station Diagnostics Certification Testing
January 2, 2002**

System Type	Examples of Vapor Recovery Systems (Currently and Previously Certified)
Balance	<ul style="list-style-type: none"> • Emco-Wheaton (G-70-17) • Exxon (G-70-23) • Atlantic Richfield (G-70-25) • OPW (G-70-36) • Chevron (G-70-37) • Texaco (G-70-38) • Mobil (G-70-48) • Union (G-70-49) • Red Jacket, Hirt (G-70-52) • Chevron (G-70-53) • OPW (G-70-77) • EZ Flo (G-70-78) • EZ Flo (G-70-101) • Rainbow (G-70-107) • Husky (G-70-125) • OPW (G-70-127) • EZ Flo (G-70-134) • EZ Flo (G-70-170)
Balance with Processor	None Certified
Vacuum Assist (Dispenser-Based)	<ul style="list-style-type: none"> • Healy (G-70-70) • Amoco (G-70-118) • Marconi (G-70-150) • Wayne (G-70-153) • Tokheim (G-70-154) • Saber (G-70-159) • OPW (G-70-163) • Franklin Electric (G-70-169) • Catlow (G-70-179) • Catlow (G-70-188) • Saber (G-70-196)
Vacuum Assist (Dispenser-Based) with Processor	None Certified
Central Vacuum	<ul style="list-style-type: none"> • Healy (G-70-165) • Healy (G-70-186)
Central Vacuum with Processor	<ul style="list-style-type: none"> • Hasstech (G-70-7) • Shell (G-70-18) • Hirt (G-70-33) • NUMMI (G-70-147) • Hasstech (G-70-164) • Hirt (G-70-177)